

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

CAMRON SNEED,	§	
<i>Plaintiff,</i>	§	
	§	
	§	
v.	§	C.A. NO.: 1:19-cv-608
	§	Jury Trial
AUSTIN INDEPENDENT	§	
SCHOOL DISTRICT,	§	
<i>Defendant.</i>	§	

PLAINTIFF'S STATEMENT OF THE CASE

Pursuant to local rule CV-16, Plaintiff submits her statement of the case as follows:

Camron Sneed, Plaintiff, brings this claim against Austin Independent School District for violating her civil rights. Title VI Of The Civil Rights Act requires a school to adequately respond to racial discrimination among its students, and to prevent derogatory racial language; humiliating conduct; offensive jokes; racial slurs; or racially offensive graffiti. This conduct creates a hostile educational environment.

Camron attended James Bowie High School. Throughout her high school years, she continuously endured racial harassment from several white students while in the band and in FFA. Camron alleges that school district personnel were actually aware of many instances of racial harassment, and were willfully blind to other instances. The school district took some action on a few occasions, but not enough to stop the harassment.

The brazen and repetitive nature of the racial harassment wore Camron down. She developed fear and significant anxiety which required psychological counseling. She lost faith in the school's willingness to adequately respond. She also quit the band. The school district's failure to adequately address the hostile environment caused her to miss out on what should have been a fulfilling high school experience.

Respectfully submitted,

/s/ ANTHONY O'HANLON

Anthony O'Hanlon

Anthony O'Hanlon, P.C.

State Bar No. 15235520

Federal ID: 3122684

Attorney and Counselor at Law

Anthony O'Hanlon, P.C.

111 South Travis Street

Sherman, Texas 75090

(903) 892-9133 (telephone)

(903) 957-4302 (fax)

aohanlon@somlaw.net

ATTORNEY FOR PLAINTIFFS

Martin Cirkiel

CIRKIEL & ASSOCIATES, P.C.

State Bar No. 00783829

Fed. ID # 21488

1901 E. Palm Valley Blvd.

Round Rock, Texas 78664

(512) 244-6658 [Telephone]

(512) 244-6014 [Facsimile]

marty@cirkielaw.com

ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2020, I hereby certify that a true and correct copy of the above and foregoing document has been electronically served on all counsel of record.

/s/ Anthony O'Hanlon

Anthony O'Hanlon